



Solargain PV Pty Ltd

Modern Slavery Statement  
Financial Year 2024/2025



**Solargain PV Pty Ltd  
Modern Slavery Statement  
Financial year 1 July 2024 to 30 June 2025 (“FY25 Reporting Period”)**

Solargain PV Pty Ltd (ABN 90 132 725 501) submits this Modern Slavery Statement pursuant to the Modern Slavery Act 2018 (Cth) in respect of the financial year 1 July 2024 to 30 June 2025 (“FY25 Reporting Period”).

This statement describes the steps Solargain has taken during the FY25 Reporting Period to identify, assess and address the risks of modern slavery in its operations and supply chains, including the effectiveness of these actions and our ongoing improvement commitments.

### **1. Reporting entity and structure**

This statement covers the activities of the following reporting entities (together referred to in this statement as “Solargain”):

- Solargain PV Pty Ltd (ACN 132 725 501)
- iStore (QLD) Pty Ltd (ACN 152 166 160) (controlled entity)

Solargain is a family-owned Australian private company first registered in August 2008 and headquartered in Malaga, Western Australia, with operations across Australia.

The preparation of this statement included consultation with the Director of iStore (QLD) Pty Ltd, who is also an executive and director of Solargain PV Pty Ltd.

### **2. Operations**

Solargain is a provider of renewable energy solutions specialising in the supply, installation, service and maintenance of:

- solar PV systems
- energy storage systems (batteries)
- solar hot water systems, heat pumps and pool heat pumps
- home electrification products, including EV charging and related solutions
- trading of renewable energy certificates

Solargain also undertakes wholesale distribution of renewable energy products (including solar modules, inverters, batteries, mounting equipment and accessories, and hot water systems).

Through iStore the business develops and delivers heat pumps and a broader home electrification product range including inverters, batteries, EV Chargers, pool heat pumps through an ODM manufacturing arrangement with production based overseas. IT development for iStore Home application is supported by Australian-based teams, with systems hosted on European servers.

Solargain operates under trading names including SG Wholesale, Service My Solar, iStore, and iStore Home.

In addition to direct operations, Solargain works with small businesses in regional locations across Australia that operate as Authorised Solargain Distributors and Authorised Service Agents.

### 3. Workforce

As of 30 June 2025, Solargain employed approximately 112 employees across nine sites in Australia. Employment arrangements comply with the Fair Work Act, the National Employment Standards (NES) and applicable awards and agreements.

Solargain also engages contractors, including installation and service subcontractors, all within Australia.

### 4. Supply chains

Solargain's supply chain is essential to delivering renewable energy solutions and includes both domestic and international suppliers.

During FY25, approximately 45% of total procurement expenditure related to products manufactured overseas, either procured directly from international manufacturers or purchased through Australian distributors and suppliers with operational representation in Australia. Solargain's key sourcing regions include (but are not limited to), China, South Korea, Austria, Indonesia, Malaysia, the Philippines and Australia.

#### Key supply chain categories include:

1. **Product and material supply**
  - solar modules, inverters, batteries
  - mounting systems, electrical components and accessories
  - hot water systems and heat pumps and pool heat pumpssourced from international manufacturers, either directly or through distributors located in Australia
2. **Construction and installation services**
  - installation and maintenance activities delivered by Solargain employees and local contractors
3. **Support services**
  - professional services (legal, engineering, accounting, recruitment)
  - IT services, marketing, procurement, logistics, consultantsprimarily sourced in Australia, with limited support from offshore BPO providers (Philippines)
4. **Ancillary services and goods**
  - cleaning and premises maintenance
  - uniforms and PPE
  - office and IT equipment (computers, laptops, mobile phones)all sourced from local providers.

### 5. Modern slavery risks in operations and supply chains

Solargain recognises that modern slavery risks may arise in global supply chains, particularly where there are complex manufacturing inputs and limited transparency at downstream tiers.

#### Where risks may arise

Solargain's modern slavery risk profile is influenced by the nature of the products we procure (solar and electrical equipment), the complexity of global manufacturing supply chains, and the geographic locations of production and raw material inputs. Risks may include:

- forced labour, debt bondage and exploitation in manufacturing environments
- excessive working hours and underpayment
- child labour and unsafe working conditions
- limited visibility over lower-tier suppliers (including raw material and component sourcing)

### **Key risk areas identified by Solargain**

#### Higher risk areas

- Overseas manufacturing, particularly for solar PV modules, inverters, batteries, heat pumps and associated components
- Downstream raw material inputs (e.g., metals, minerals and processed inputs) where Solargain has limited direct traceability
- Labour-intensive manufacturing in certain jurisdictions where labour protections and enforcement may be weaker

#### Lower risk areas

- Solargain's direct Australian workforce is considered lower risk due to strong workplace laws, employment standards and regulatory oversight
- Many Australian contractors are small business operators working within their own businesses, and Solargain's controls support fair payment and compliance expectations

### **Incidents**

During FY25, Solargain did not identify any confirmed incidents of modern slavery in our operations or supply chains, and no specific concerns were reported through our internal reporting pathways. Solargain recognises that the absence of identified incidents does not mean modern slavery risks are not present, particularly where supply chain visibility is limited, and we remain committed to strengthening our systems and controls.

## **6. Actions taken to assess and address modern slavery risks**

Solargain is committed to conducting business ethically and responsibly and expects employees, contractors and suppliers to uphold the same standards.

### **Governance and accountability**

- Oversight of modern slavery risk management is led by senior management and supported by procurement and operational leadership.
- Modern slavery is integrated into broader ethical sourcing and supplier risk management practices.

### **Due diligence and risk assessment**

During FY25, Solargain continued to implement and improve its modern slavery due diligence program, including:

- internal risk assessment of operations and procurement categories to identify higher-risk areas
- supplier onboarding and review processes that consider modern slavery risks, including jurisdictional and industry risks
- implementation and ongoing use of a modern slavery supplier questionnaire for relevant suppliers
- contractual terms and supplier expectations, including ethical and compliance clauses relating to modern slavery
- factory inspections and supplier engagement where feasible for higher-risk suppliers and relationships
- site visits to BPO providers to assess working conditions and ethical practices

### **Supplier engagement and audits/inspections**

Where Solargain has direct supplier relationships, we seek to use this leverage to encourage transparency and continuous improvement.

During FY25, Solargain conducted site inspections and engagement activities, including:

- Three factory visits were conducted in China in FY25
- One site visit to BPO in the Philippines, including direct employee meetings being undertaken.
- employee discussions where appropriate
- assessment of working conditions, health and safety controls, wage practices and recruitment processes

Where Solargain has limited influence (e.g., large multinational manufacturers or lower-tier suppliers), we support and encourage broader industry initiatives and improvements in ethical sourcing practices.

### **Remediation approach**

If a modern slavery risk is identified, Solargain is committed to working with the supplier to implement corrective actions within a defined timeframe. Where remediation is not possible or not achieved, Solargain may escalate the matter and/or terminate the supplier relationship. Solargain's priority is to ensure that responses to modern slavery concerns are safe, victim-centred and focused on preventing further harm.

## **7. Training and awareness**

Solargain recognises that awareness and training are essential to identifying and responding to modern slavery risks.

During FY25, Solargain:

- continued to build awareness of modern slavery risks with relevant staff
- prioritised training for employees involved in procurement, supply chain management and supplier engagement
- progressed development of an online training platform to broaden access to modern slavery and ethical sourcing education across the workforce

## **8. Policies and internal controls**

Solargain maintains policies and procedures that support ethical business conduct and help manage modern slavery risks, including:

- Modern Slavery Policy
- procurement and supplier management processes (including due diligence and contractual requirements)
- workplace and HR policies aligned to Australian employment standards
- mechanisms for reporting concerns (including internal escalation pathways)

Solargain intends to strengthen supplier-facing policy implementation through a Supplier Code of Conduct and structured compliance declarations.

## **9. Assessing effectiveness**

Solargain recognises the importance of measuring the effectiveness of actions taken to address modern slavery risks and is committed to continuous improvement.

During FY25, Solargain reviewed its approach through senior management engagement and consideration of:

- key modern slavery risks and whether risk controls remain appropriate

- supplier assessment completion rates and quality of responses
- outcomes from supplier inspections and engagement
- any reported concerns and how these were handled
- the alignment and adherence of relevant policies and procedures (procurement, HR, supplier management)

Solargain will continue to improve effectiveness measures over time, including by tracking supplier engagement outcomes and strengthening reporting and review processes.

### 10. Ongoing improvement commitments for FY26

During the FY26 reporting period, Solargain aims to:

1. Review and strengthen policies and procedures relating to modern slavery risk management and ensure implementation across the business.
2. Introduce and roll out a Supplier Code of Conduct and an annual supplier compliance declaration for relevant suppliers.
3. Improve supplier risk segmentation to better focus enhanced due diligence efforts on higher-risk suppliers and jurisdictions.
4. Expand and embed modern slavery training, including broader workforce training via an online platform and targeted procurement training.
5. Continue supplier engagement activities, including site inspections and BPO engagement where feasible.

### 11. Consultation

Solargain PV Pty Ltd has majority ownership and control of iStore (QLD) Pty Ltd.

Consultation between the entities occurs through shared management and governance, including:

- the Director of iStore (QLD) Pty Ltd also being an executive and director of Solargain PV Pty Ltd
- shared policies and management systems operating across both entities
- iStore (QLD) Pty Ltd having no direct employees, with Solargain executives contributing to management as required

### 12. Approval

This Modern Slavery Statement was approved by the Board of Solargain PV Pty Ltd as the parent entity on 18<sup>th</sup> December 2025.

Signed:



Domenic Mercuri  
Director and Secretary



Wayne Petridis  
Director

For and on behalf of Solargain PV Pty Ltd